

Federal Defenders  
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Southern District  
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May 28, 2024


***By Email & CM/ECF***

The Honorable Ronnie Abrams  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Application granted.

SO ORDERED.

Re: *United States v. Demoya-Garcia*  
23 Mag. 06280 (RA)

  
Ronnie Abrams, U.S.D.J.  
May 29, 2024


Dear Judge Abrams,

I write to respectfully request, with the consent of Pre-Trial Services, that the Court modify Miguel Demoya-Garcia's bail conditions to remove the location monitoring requirement and corresponding ankle bracelet. The Government defers to Pre-Trial Services.

Since his presentment on September 1, 2023, Mr. Demoya-Garcia has scrupulously adhered to his bail conditions. He has also started participation in the Young Adult Opportunity Program with Your Honor and has enrolled in classes at Lincoln Technical Institute. Given these developments, the defense respectfully submits that the location monitoring requirement is not the least restrictive means of reasonably assuring the safety of the community and Mr. Demoya-Garcia's future appearance in court (18 U.S.C. § 3142(c)(1)(B)), and that it is no longer warranted.

I thank the Court for its consideration of this application.

Respectfully Submitted,

  
Andrew John Dalack  
Assistant Federal Defender

Cc: Officer Dayshawn Bostic  
AUSAs Matthew Weinberg & Alexandra Messiter